

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

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**UNITED STATES OF AMERICA**

**VS.**

**GARY MICHAEL BEACH**

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**CRIMINAL NO. 3:16-cr-00472-N**

**DEFENDANT GARY BEACH'S LIST OF WITNESSES**

COMES NOW, the Defendant, GARY MICHAEL BEACH, by and through his attorneys of record and respectfully presents to the Court the following list of probable witnesses:

**PROBABLE FACT WITNESSES:**

1. Richard Dafoe  
1601 Elm Street, Suite 4100  
Dallas, Texas 75201

Mr. Dafoe was the attorney who represented Gary Beach in connection with the bankruptcy. He will testify as to the facts and circumstances regarding Gary Beach's bankruptcy filings and subsequent testimony.

**POSSIBLE FACT WITNESSES:**

1. Gary Beach  
3131 Maple Avenue, Apt. 8A  
Dallas, Texas 75201

Mr. Beach is the Defendant and may testify as to all the facts and circumstances surrounding the filing of his bankruptcy and his subsequent testimony.

2. Sean O'Brien  
750 Lexington Avenue, 25<sup>th</sup> Floor  
New York, New York 10022

Mr. O'Brien will testify that he was the attorney who deposed Gary Beach at the April 3, 2012 and May 29, 2012 depositions. He can testify as the facts and circumstances surrounding the depositions. Further, he was one of the attorneys who cross-examined Gary Beach at the 341 creditors meetings on January 10, 2012.

Additionally Mr. O'Brien will testify that the attorney representing Gary Beach during the trial of *Beach Capital Partnership, et al v. Deeprock Ventures Partners, et al* failed to properly submit Gary Beach's damages to the jury in the jury instructions.

**PROBABLE EXPERT WITNESSES:**

1. Chris Dellings  
1230 Clipston Drive  
Prosper, Texas 75078

Mr. Dellings is a CPA and will testify as to the distributions from the trust and as to the funds going in and out of the various Beach entities. He will testify as to the matters set out in the expert witness notice. See Defendant's Designations of Expert Witnesses.

2. Behrooz Vida  
3000 Central Drive  
Bedford, Texas 76021

Mr. Vida is a bankruptcy lawyer and will testify about the bankruptcy filings and related issues about income and asset disclosures. He will testify as to the matters set out in the expert witness notice. See Defendant's Designations of Expert Witnesses.

3. Richard Dafoe  
1601 Elm Street  
Dallas, Texas 75201

Mr. Dafoe is the bankruptcy lawyer who represented Gary Beach. See Defendant's Designations of Expert Witnesses.

Respectfully submitted,

/s/ MARTIN LENOIR

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**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 5th day of February, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Mr. David L Jarvis  
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/s/ MARTIN LENOIR  
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